

DOCKETED

Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	267605
Document Title:	Proposed COC WORKER SAFETY-7
Description:	Dixon Fire Protection District input on proposed COC WORKER SAFETY-7
Filer:	Doug Urry
Organization:	Doug Urry/Tetra Tech
Submitter Role:	Applicant Consultant
Submission Date:	11/18/2025 1:11:54 PM
Docketed Date:	11/18/2025

To: California Energy Commission
From: Doug Urry/Tetra Tech
Cc: Stephen Ahn/NextEra
Date: November 18, 2025
Subject: Corby Battery Energy Storage System Project Proposed Revisions to Condition of Certification Worker Safety-7

On May 23, 2025, North Bay Interconnect, LLC and Corby Energy Storage, LLC (Applicant) filed proposed revisions to Conditions of Certification WORKER SAFETY-7, 8 and 9 proposed by Staff in the Darden Clean Energy Project Revised Final Staff Assessment (TN 263053) (Darden Fire COCs). Subsequent to that filing, the Applicant has coordinated further with Dixon Fire Protection District (FPD) to discuss the proposed fire safety measures and has incorporated Dixon FPD input into the revised proposed Condition of Certification WORKER SAFETY-7 provided herein. The following items are attached:

- 1) Proposed revisions to WORKER SAFETY-7 (markups are relative to Darden WORKER SAFETY-7).
- 2) Email coordination with Dixon FPD confirming agreement with the proposed revisions to WORKER SAFETY-7, including attached information requested by Dixon FPD related to drone technology use for incident monitoring.
- 3) Meeting notes from a coordination call between the Applicant and Dixon FPD held on October 6, 2025.
- 4) Meeting notes from a coordination call between the Applicant and Dixon FPD held on September 18, 2025.

ATTACHMENTS

PROPOSED REVISIONS TO WORKER SAFETY-7

(Tracked edits shown are relative to the Darden COCs; further edits to the version filed on May 23, 2025 are included to incorporate feedback from Dixon Fire Protection District)

WORKER SAFETY-7 The project owner shall do the following at the BESS facility:

- a. Require that the lithium-ion batteries be shipped from the factory to the project site at a maximum of 30 percent State of Charge (SOC);
- b. Provide that fire lanes exist within the site down the length and width of the BESS units wide enough to allow for fire engine access in accordance with the more restrictive stringent of either California Fire Code Section 503 or Appendix D adopted by the Dixon Fire Protection District (FPD);
- c. Provide at least two gates into the BESS facility wide enough for emergency access, including Knox box access for DFPD and City of Vacaville Fire Department;
- d. Install remote fire or heat sensors at sufficient locations to cover the entire BESS facility (e.g., temperature sensors, thermal infrared, or other heat detection devices);
- e. Provide on-site hydrogen fluoride (HF) gas test strips at an approved location easily accessible to first responder personnel;
- ~~d.f.~~ Provide fire water tank with a capacity of 24,000 gallons and with fittings and connectors specified in accordance with NFPA 1142 to allow fire trucks to fill their tanks flow of at least 1,500 gallons per minute and coordinate with Dixon FPD to provide approved hard suction hose available at a location easily accessible to first responder personnel;
- e.g. Provide a method of video monitoring available to the Incident Commander in a Command and Control Center located at a safe distance from the BESS facility during an incident, utilizing technology with its own separate power supply and capable of operating in low-light conditions and providing coverage for the entire BESS facility (e.g. closed-circuit television [CCTV] cameras, remotely operated drone, or other approved method), so long as not inconsistent with or in

~~violation of FERC standards~~Install closed circuit television (CCTV) cameras with Pan, Tilt, Zoom (PTZ), and low-light capability that cover the entire area of the BESS and which would have their own separate power supply as long as not inconsistent or in violation of FERC standards;

~~f.h.~~Establish a Command and Control Protocol in accordance with the Emergency Response Plan for staff to perform emergency duties and responsibilities during the detection, initiation, and escalation of a BESS fire including access to the project owner's Renewable Operations Control Center 24/7 telephone number;

~~g.~~Establish remote telemetry and CCTV viewing available to the Incident Commander in a Command and Control Center located at a safe distance from the BESS facility for an Incident Commander to use, as long as not inconsistent or in violation of FERC standards;

~~h.i.~~Establish an annual joint training program with the Dixon FCFPD that includes table-top exercises for a BESS fire;

~~i.j.~~Within 10 business days of a fire-related safety incident at the BESS facility, the project owner shall provide copies to the Dixon FPD of any initial report provided to applicable regulatory agencies pursuant to CPUC GO 167-C related to the incident, with a follow-up report provided following completion of a root cause analysis; Provide copies of any information submitted to the CPUC pursuant to General Order 167 c Prepare and submit a Root Cause analysis of any incident at the BESS facility (including but not limited to fire, malfunction, leak, or thermal runaway of any cell, module, or unit) to the CPM;

~~j.k.~~Consult with the Dixon FCFPD in preparing the fire protection system specifications and drawings for the Control Enclosure Operations and Maintenance Building to ensure an adequate water supply for the fire suppression systems for the BESS facility as well as for occupied buildings; and

~~k.l.~~Implement the final provisions of CPUC GO 167-C.

Verification: At least 60 days prior to the start of construction, the project owner shall provide all the information required above (with the

exception of ~~jk~~) to the [Dixon FCFPD](#) for review and comment, to the [compliance project manager \(CPM\)](#) for review and approval, and to the [delegate chief building official \(DCBO\)](#) for plan check approval and construction inspection.

~~Within 10 days of an incident at the BESS facility (including but not limited to fire, malfunction, leak, or thermal runaway of any cell, module, or unit) the project owner shall notify the CPM of all compliance activities required by CPUC 167 c and provide any information submitted to the CPUC to the CPM that a Root Cause Analysis (RCA) is being prepared. The project owner shall work with the CPM to determine a submission date for the completed RCA. The RCA shall be submitted to the FCFPD for review and comment, and to the CPM for review and approval.~~

Explanations for the Proposed WS-7 COC Edits

(text edits below represent updates relative to the previous proposed revisions to WS-7 filed on May 23, 2025)

Section b, Fire Lanes

Section b. as currently written would require the Project to construct roads to each individual BESS unit wide enough to fit a fire engine. The site has been designed with fire access roads to permit overall safety and in accordance with [the more restrictive of either CFC Section 503 and Appendix D adopted by Dixon FPD. Dixon FPD confirmed during the 9/18/2025 and 10/6/2025 meetings that the proposed access road design meets the applicable code requirements.](#)

As discussed in more detail below, in practical application, during a thermal runaway incident, it is neither safe nor standard procedure for fire engines to approach a burning BESS unit. Instead, our emergency response plans advise allowing the BESS to burn and consume itself, while being monitored from a safe distance by first responders. This approach is recommended to ensure the safety of emergency personnel and is supported by established safety protocols.

For this reason, we have modified Section b. to require that the site roads comply with [the more stringent of CFC Section 503 or Appendix D adopted by the Dixon FPD.](#)

Section c, Emergency Access Gates

Based on discussion with Dixon FPD on 9/18/25, we are proposing to provide Knox box access to the facility for both Dixon FPD and City of Vacaville Fire Department, based on Dixon FPD's clarification that the City of Vacaville Fire Department currently has the station closest to the site and may respond to a future incident at the site under their mutual aid agreement.

Section d, Remote Heat Sensors

We agree that remote heat sensors in combination with other remote monitoring devices are an essential part of the fire prevention and response plans and consistent with NFPA 72. The purpose of the proposed modifications outlined above is to clarify that listing of thermal infrared in the condition does not mean that it is the only option for providing appropriate sensing devices.

The current design of the BESS includes a SCADA (Supervisory Control and Data Acquisition) System and BMS (Battery Management System) system. All detections are monitored continuously by our 24/7/365 remote operational control center. This setup guarantees real-time monitoring and immediate response to any fire or smoke incident, ensuring optimal safety and data available to the incident commander during an emergency event. In the event that the incident commander is not project owner personnel, the information will be provided to the incident commander by project owner personnel sufficiently trained to access the SCADA/BMS system remotely.

The BMS/SCADA: system includes the following features:

- Continuously monitors critical operating parameters such as voltage, current, and temperature.
- Detects anomalies providing early warning signs of potential battery failure.
- Rapidly disconnects any problematic battery to prevent escalation.
- Prior to operation, controls and monitoring mechanisms for all battery systems are established.
- Enables screening millions of data points per second to detect behavioral changes in batteries.
- Identifies slower changes that might suggest maintenance or replacement needs.

- It is equipped with combination smoke/fire and combustible gas monitoring tools to alert of events.
- Provides insights on risks before approaching any system with issues.

The systems also includes a human-machine interface (HMI) in the site control enclosure that provides significantly greater telemetry than would be obtained by a site fire panel, as it has access to the full fire alarm signaling as well as the status of the BESS, including voltage and temperatures. Each container is equipped with a horn and strobe that will activate in the event of smoke, fire, or gas detection, so it will be extremely easy to identify which container is experiencing the event and to monitor surrounding containers.

The CEC Staff cite as an example of the use of remote sensing devices by an incident commander in the response to the Elkhorn Tesla Megapack fire. An incident commander would be provided information by project owner personnel from the system through the control house or through a remote connection to the SCADA/BMS system and have real-time data available to respond to a fire at the Project.

Section e, Hydrogen Fluoride Test Strips

Based on discussion with Dixon FPD on 9/18/2025 and 10/6/2025, we are proposing to provide HF indicator test strips on site for emergency responder use, either within Knox boxes or another easily accessible location approved by Dixon FPD.

Section f, Fire Water Tank

We discussed the proposed 24,000-gallon fire water tank design and function with Dixon FPD on 9/18/2025 and 10/6/2025. Dixon FPD agreed with the design basis for the tank and advised that a 4.5-inch connection would need to be provided facing the street for fire department access and use. We are not proposing to provide pressurized tanks equipped with pumps providing active flow; the purpose of the tank would be for fire truck replenishment using on-board pumping to refill truck tankage. As discussed with Dixon FPD on 10/6/2025, the condition requires coordination with Dixon FPD to provide approved hard suction hose available at a location easily accessible to first responder personnel.

Sections ~~s~~ g and former section gi, CCTV and Remote Access

Applicant agrees to these requirements but has added language to the condition to provide a means of flexibility to achieve the intent of the requirements without prescribing the exact technology and method used to meet said requirements. Applicant's edits also combine the concepts previously identified in former Section g and ensure that providing the CCTV and remote access the technologies and methods used would not be inconsistent with or violate FERC requirements ~~and that the information would be provided to an incident commander.~~

Section h, Command and Control Plan

This provision was modified to avoid confusion by ensuring that the Command and Control Plan is consistent with the Emergency Response Plan for the Project. The provision was further modified to reference NextEra's Remote Operations Command and Control Center (ROCC) based on discussions with Dixon FPD regarding first responder information access.

Sections ~~jj~~ and kl, Fire District Coordination

The modifications to these sections are ~~simply~~ to refer to the Dixon FPD ~~District~~ instead of FCFPD and to refer to project-specific infrastructure (i.e., the control enclosure).

Sections j and ~~I-k~~, Root Cause Analysis

The ~~ese~~ s sections ~~has~~ ves been modified to be consistent with CPUC GO 167-~~Ce~~ to avoid any inconsistencies in reporting requirements. Section j was also modified to include a condition requiring the project owner to provide copies of fire-related safety reports prepared pursuant to CPUC GO 167-C to Dixon FPD.

Verification

The verification section was modified to be consistent with the modifications proposed to the requirements in the condition discussed above.

From: [Randy Shafer](#)
To: [Ahn, Stephen](#); [John Malone](#); [Adams, Josh](#); [Elizondo, Adrian](#); [Benson, Michael p](#); [Omercajic, Nadan](#); [Urry, Doug](#); [Harrison, Joe](#); [Esposito, Elisabeth L.](#); [Fire Marshal](#); [REDACTED]
Cc: [Andrew Reiwitch](#); [Leone, Christine](#)
Subject: Re: Corby BESS - Follow-up Call with Dixon Fire
Date: Thursday, November 6, 2025 4:14:09 PM
Attachments: [image001.png](#)
[Outlook-COLOR.png](#)

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CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

No objections.

COLOR



RANDY SHAFER
DEPUTY FIRE CHIEF/
ACTING FIRE CHIEF
DIXON FIRE DEPARTMENT
205 Ford Way Dixon, CA 95620
[REDACTED]
[REDACTED]

From: Ahn, Stephen <[REDACTED]>
Sent: Tuesday, November 4, 2025 4:22 PM
To: John Malone <[REDACTED]>; Adams, Joshua <[REDACTED]>;
Elizondo ramirez, Adrian <[REDACTED]>; Benson, Michael
<[REDACTED]>; Omercajic, Nadan
<[REDACTED]>; Urry, Doug <[REDACTED]>; Harrison, Joe
<[REDACTED]>; Esposito, Elisabeth L. <[REDACTED]>; Randy Shafer
<[REDACTED]>; Fire Marshal <[REDACTED]>;
[REDACTED];
[REDACTED]; Morley, Ricardo
<[REDACTED]>
Cc: Andrew Reiwitch <[REDACTED]>; Leone, Christine
<[REDACTED]>
Subject: RE: Corby BESS - Follow-up Call with Dixon Fire

Thank you, Chief Shafer. If there are no objections, we will get these docketed.

Stephen Ahn | *Project Director*
NextEra Energy Resources

Mobile: + [REDACTED]

From: John Malone [REDACTED] >

Sent: Tuesday, November 4, 2025 6:35 PM

To: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Cc: Andrew Reiwitch [REDACTED]

Subject: Re: Corby BESS - Follow-up Call with Dixon Fire

Perfect. Thank you.

John Malone
Retired Annuitant
Fire Prevention
Dixon Fire Department

From: Adams, Joshua [REDACTED]

Sent: Tuesday, November 4, 2025 3:33 PM

To: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Corby BESS - Follow-up Call with Dixon Fire

Good afternoon Chief Malone,

While there may not have been specific references to UL9540 or 9540A in the most recent materials provided, there are references to NFPA 855 and CFC elsewhere. Both NFPA 855 and CFC inherently include requirements/references for listing to UL9540 (855 §4.6.1 & CFC §1207.3.1) and testing to UL9540A (855 §9.1.5 & CFC §1207.1.5).

Thus, while perhaps not specifically referenced, there are most certainly requirements in place for UL9540 and UL9540A.

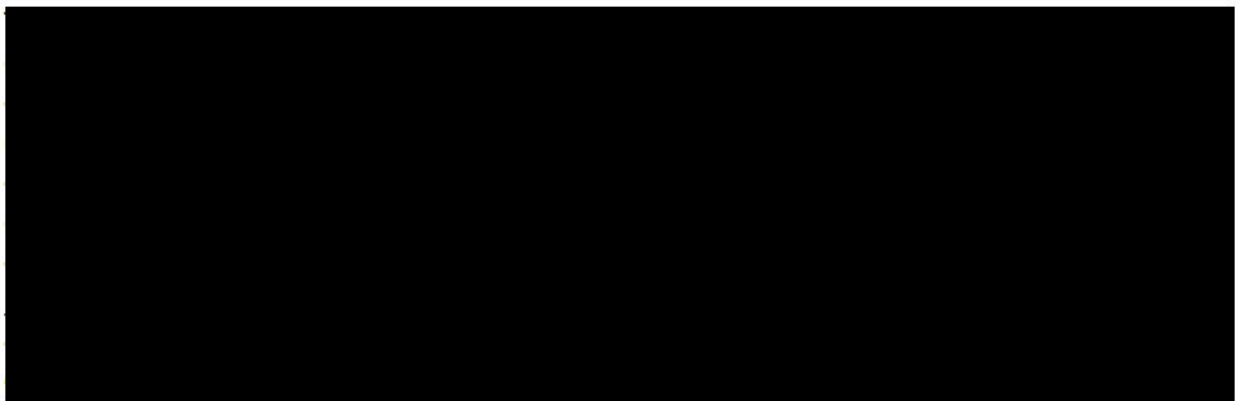
Best,

Josh Adams
ESS Engineering Manager



From: John Malone [REDACTED] >

Sent: Tuesday, November 4, 2025 2:06 PM



Subject: Re: Corby BESS - Follow-up Call with Dixon Fire

Good Afternoon,

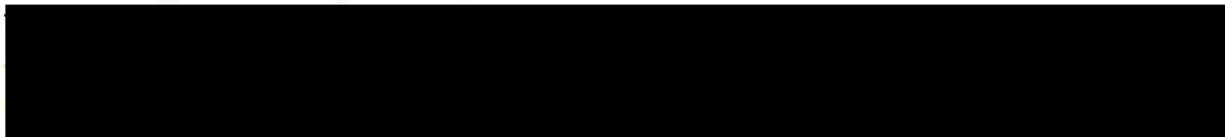
I have a quick question regarding the materials. I may have overlooked it, but I'm not seeing any reference to UL 9540 or UL 9540A. Could you confirm if these requirements are included, or did I miss them?

Thank you,

John Malone
Retired Annuitant
Fire Prevention
Dixon Fire Department

From: Ahn, Stephen [REDACTED]

Sent: Tuesday, November 4, 2025 8:07 AM



[REDACTED]

Subject: RE: Corby BESS - Follow-up Call with Dixon Fire

Hi Chief Shafer,

I hope you had a pleasant conference last week. Please let me know if you have any comments or questions on the materials (reattached for your convenience). We are happy to schedule another call if you would like to discuss the changes or simply concur with the revisions to the COCs and the meeting notes.

Stephen Ahn | *Project Director*

NextEra Energy Resources

Mobile: [REDACTED]

From: Ahn, Stephen

Sent: Monday, October 27, 2025 3:22 PM

[REDACTED]

Subject: RE: Corby BESS - Follow-up Call with Dixon Fire

Hi Chief Shafer, Chief Malone, and Bureau Veritas team –

Thank you again for taking the time to meet with us on October 6th to provide further feedback on the conditions of certification (COCs) for the Corby project related to fire / worker safety.

Attached for your review are notes from our last meeting and revisions to the proposed COCs that respond to all the outstanding feedback you provided. I have also attached several helpful resources from the Skydio team regarding drone use in lieu of CCTV.

I would appreciate it if you could please let me know whether you concur with the revisions to the COCs and the notes, or whether you would like to schedule another call to go over them. Once the

COCs and notes accurately reflect our discussion, we will docket them with the CEC.

- X10 Drone Data Sheet
- Dock for X10 Data Sheet
- Dock for X10 Maintenance & Repair Services – Skydio provides end-to-end services for the dock solution (excluding piloting, which is handled by FPLAir).
- Short video of Dock for X10 - <https://www.skydio.com/dock>
- Skydio Resources (Utilities Filter): <https://www.skydio.com/resources>

If you would like to see the solution in action, we would be happy to help coordinate a live demonstration.

Stephen Ahn | *Project Director*

NextEra Energy Resources

Mobile: +1 [REDACTED]

-----Original Appointment-----

From: Ahn, Stephen

Sent: Thursday, September 18, 2025 5:33 PM

To: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Cc: Andrew Reiwitch

Subject: Corby BESS - Follow-up Call with Dixon Fire

When: Monday, October 6, 2025 12:30 PM-1:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Microsoft Teams Meeting

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Get the critical data you need wherever and whenever you need it with the groundbreaking Skydio X10. Featuring more megapixels and better optics than any drone its size, X10 offers unrivaled onboard computing power that enables you to automate complex data capturing missions—even in GPS-denied or high EMI environments. With the X10's class-leading cameras, you'll never miss another important detail again.

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Max flight time.

<40 sec

Deployment time.

IP55

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45 mph

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Visionary cameras.

- 64 MP narrow
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- 50 MP wide with LED flashlight
- Teledyne FLIR Boson+ thermal sensor



Onboard AI.

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- NVIDIA Jetson Orin GPU
- 360-degree visibility
- Autonomous flight, day or night



Ready for anything, anytime, anywhere.

- Under 4.7 pounds
- Open, modular platform
- 5G cellular connectivity

Technical Specs

Aircraft



Startup Time	Under 40 seconds
Dimensions (unfolded, propellers)	31.1" x 25.6" x 5.7"
Dimensions (folded)	13.8" x 6.5" x 4.7"
Weight (including batteries)	Connect SL: 2.11 kg / 4.65 lbs Connect SL + 5G: 2.14 kg / 4.72 lbs
Max Hover Time	35 minutes
Max Flight Time	40 minutes
Processors	NVIDIA Jetson Orin SoC
Ingress Protection Rating	IP55
Operational Temperature Range	-20 °C to +45 °C / -4 °F to 113 °F
Wireless Range (no interference, line of sight operation)	Connect SL: 12 km / 7.5 miles Connect 5G: Unlimited (wherever cellular coverage is available)
Wireless Networking	Connect SL: WiFi6 Connect 5G: Cellular LTE/5G
Obstacle Avoidance Coverage	True °360



Controller

Controller Dimensions	10.5" x 5" x 3"
Screen	6.6" dynamic AMOLED touchscreen 120 Hz adaptive refresh rate Resolution: 2340 x 1080 pixels Brightness: 1750 nits (outdoor peak) Pixel density: 392 ppi
Weight	1.14 kg / 2.50 lbs
Max Range*	Connect SL: 12 km / 7.5 miles Connect 5G: Unlimited
Operating Frequency	Connect SL: 2400-2483.5 MHz / 5150-5850 MHz Connect 5G: 600 MHz-4400 MHz
Ingress Protection Rating	IP54
Wired Outputs	HDMI (type A) & USB-C
Wireless Networking	WiFi6, Cellular LTE/5G

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Telephoto Camera

Sensor	Sony IMX586-K, 1/2", 48 MP, CMOS
Diagonal Field of View	13°
Focal Length	35 mm (190 mm equivalent)
Max Video Resolution	3840 x 2880
Aperture	f/2.2

Wide Camera

Sensor	Sony IMX989, 1", 50.3 MP, CMOS
Diagonal Field of View	93°
Focal Length	8 mm (20 mm equivalent)
Max Video Resolution	3840 x 2880
Aperture	f/1.95

Narrow Camera

Sensor	Sony IMX686, 1/1.7", 64 MP, CMOS
Diagonal Field of View	50°
Focal Length	10 mm (46 mm equivalent)
Max Video Resolution	3840 x 2880
Aperture	f/1.8

Thermal Camera

Thermal Imager	Teledyne FLIR Boson+ Uncooled VOx Microbolometer
Diagonal Field of View	41°
Focal Length	13.6 mm (60 mm equivalent)
Aperture	f/1.0
Thermal Sensitivity	<30 mK NEDT
Infrared Temperature Measurement Accuracy	larger of ± 5 °C or 5%
Max Video Resolution	640 x 512
Temperature Measurement Method	Spot Meter, Area Measurement
Palette	White Hot, Black Hot, Iron Bow, Rainbow

Dock for X10



Enter a new era of autonomous work.

Position docked drones where the work happens, remotely operate them from anywhere in the world, and get the data your teams need to act; from real-time situational awareness to pre-planned asset inspections.

Built for reliability in challenging environments.

Dock for X10 is built to withstand harsh weather related challenges like rain, snow, wind, scorching heat, and freezing cold. Your X10 drone will be ready to fly as soon as conditions allow.

20 sec

Time to get airborne.

24/7

Continuous operation,
day or night.

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Safely operate in extreme
temperatures.

5G

Unlimited Flight Range.¹

Operate Beyond Visual Line of Sight (BVLOS).

Dock for X10's built-in weather sensors and ADS-B (aircraft position transmitter) combined with Skydio X10's world leading autonomy provide the Remote Pilot in Command (RPIC) with an accurate picture of both the airspace and conditions on the ground — even when nobody is onsite.²



Command your fleet.

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Fly with unlimited range.

Skydio Connect Fusion lets drones instantly switch between a point-to-point connection to the dock and 5G connection for unlimited range.¹



Work safely.

Enterprise-grade safety features let you conduct pre-flight checks remotely, customize surround lighting, and set audible alerts.

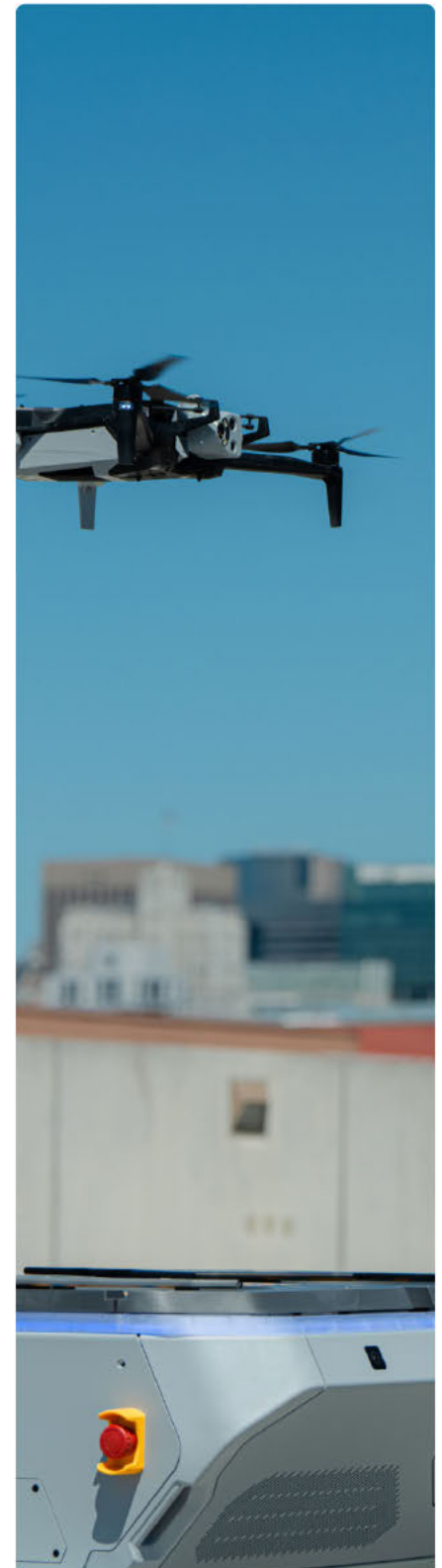
Technical Specs

Dock for X10

Launch / Land Winds	Up to 12 m/s (27 mph)
Operational Temperature	-20° to 50 °C / -4° to 122 °F
Standby Temperature	-40° to 60 °C / -40° to 140 °F
Dock Dimensions	34.1" L x 37.7" W x 55.5" H (with base)
Dock Weight	240 lbs (with base)
Ingress Protection (Roof Open)	IP54
Ingress Protection (Roof Closed)	IP56
Battery Charge Time	15% to 95% within 35 minutes at 25 °C
Service Life	5 years with minor service conducted (Estimated at 3 flights/day avg)
Corrosion Resistance	Designed to operate in humid environments, outside of direct saltwater splash zone
Rain and Snow Limitations	X10 operational capability: 0.25"/hr (light-moderate), Dock Standby: 4"/hr (Heavy)
Input/Output	2x POE RJ45 (30W, 48V), 1x USB3.0 (5W, 5V)
220V Power Requirement	Recommended below 0 °C
Onboard Storage	512GB (Non-removable, for media sync purposes only)
Launch Time	Airborne in 20 seconds

X10 Aircraft

Dimensions (unfolded, propellers)	31.1" x 25.6" x 5.7"
Dimensions (folded)	13.8" x 6.5" x 4.7"
Weight (including batteries)	Connect SL: 2.11 kg / 4.65 lbs Connect SL + 5G: 2.14 kg / 4.72 lbs
Max Hover Time	35 minutes
Max Flight Time	40 minutes
Processors	NVIDIA Jetson Orin SoC
Ingress Protection Rating	IP55
Operational Temperature Range	-20 °C to 45 °C / -4 °F to 113 °F
Wireless Range (no interference, line of sight operation)	Urban: 1-2 km (0.6-1.2 miles) Suburban: 2-6 km (1.2-3.7 miles) Rural: 6-12 km (3.7-7.5 miles) Max: 12 km (7.5 miles) Connect 5G: Unlimited (wherever cellular coverage is available)
Wireless Networking (media offload)	Connect SL: WiFi6 Connect 5G: Cellular LTE/5G
Obstacle Avoidance Coverage	True °360



Meeting Notes

Date: 10/06/2025

Attendees:	Dixon Fire Protection District (DFPD) <ul style="list-style-type: none">• Chief Randy Shafer• Andrew Reiwitch (Bureau Veritas (BV))	NextEra <ul style="list-style-type: none">• Stephen Ahn• Josh Adams• Adrian Elizondo• Ricardo Morley• Nadan Omercajic• Elisabeth Esposito/Brownstein Hyatt Farber Schreck• Doug Urry/Tetra Tech• Joe Harrison/Tetra Tech
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Subject: *Corby Battery Energy Storage System Project Fire Protection Follow-up Discussion*

Elisabeth Esposito: Purpose of meeting is to discuss and obtain DFPD concurrence on revisions to proposed Conditions of Certification (COCs) related to fire/worker safety that were made based on the previous meeting with DFPD on 9/18/25 and after internal review by the NextEra team. Stephen Ahn forwarded these proposed edits to the attendees on 10/3/25.

WS-7a: No changes from prior version.

WS-7b: Chief Shafer and Andrew Reiwitch agreed with newly proposed language requiring fire lanes in accordance with California Fire Code (CFC) Section 503 or Appendix D adopted by DFPD, as long as the condition specifies that the requirement is compliance with the “more restrictive” of either Section 503 or Appendix D, given that Appendix D is more restrictive than CFC Section 503. Language is somewhat redundant, but clarifies that local more restrictive requirements are in addition to the general CFC Section 503 requirement. NextEra team agreed with and implemented the edit (adding “the more restrictive of either” to the condition).

WS-7c: NextEra proposed this new condition language per the prior 9/18/25 meeting. The condition now requires that Knox box access will be provided for both DFPD and City of Vacaville Fire Department (FD). DFPD agreed with the language.

WS-7d: No changes from prior version.

WS-7e: NextEra proposed this condition requiring that hydrogen fluoride (HF) gas test strips be provided at an on-site location easily accessible to first responder personnel per the 9/18/25 meeting. Chief Schafer confirmed the draft condition meets the intent of previous discussion. Andrew Reiwitch asked about the proposed location of storage. Josh Adams suggested the potential for storage in the Knox box. DFPD team explained that other agencies in addition to DFPD and City of Vacaville FD may respond to larger incidents; therefore, the parties may need to explore options for providing a sufficient quantity of strips for various responding agencies. DFPD agreed the details could be worked out later when they “approve” the HF test strip storage location. NextEra team agreed to edit the proposed condition to refer to “an approved” location for storage of the HF test strips.

WS-7f: As discussed on 9/18/25, the proposed updated language is intended to clarify tank capacity, with fittings and connectors in accordance with NFPA 1142. Andrew Reiwitch discussed need for hard suction lines to allow water to be drawn instead of being pressurized. DFPD carries hard suction lines, but City of Vacaville FD does not. Chief Shafer recommends keeping hard suction system on site for various responding agencies. Andrew Reiwitch recommends listing the hard suction requirement in the condition, but not prescribing detailed specifications (e.g., two metal sleeves of specific length with padlocks, etc.). NextEra agreed that it can provide hard suction hoses on site and will draft further proposed condition language for DFPD review.

WS-7g: NextEra has suggested edits to this condition based on internal discussion. NextEra recommends rewording based on the intent of the condition (ability to monitor the site during an incident). The prior language is very prescriptive (requiring a CCTV system), however there may be other approaches (e.g., drone use) that meet the intent of the condition and provide benefits as compared to CCTV. Andrew Reiwitch noted that drone monitoring is an active process (e.g., requiring personnel to launch and operate and could require waiting for availability). In contrast, CCTV would be passive, not requiring personnel actions during incident (e.g., cameras would provide real-time monitoring for visual observation from beginning of the event). Josh Adams explained that CCTV access will require personnel that are trained/authorized to access. Under the proposal to use a drone for monitoring, a drone would be staged on site and could be operated remotely providing real-time information during the initial stages of an event. Andrew Reiwitch asked for examples of where this has been employed, including any reports on drone O&M process, inspections, use reports, etc. to evaluate effectiveness. NextEra agreed to research and provide any available information from other sites with active on-site drone use for DFPD review.

WS-7 h and i: No changes from the previous call.

WS-7j: Changes were made to clarify that copies of fire-related safety incident reports would be provided to DFPD within 10 business days of the incident. Chief Shafer agreed that 10 business days is reasonable for complex reports. Andrew Reiwitch recommended language indicating that the “initial report” would be provided in 10 business days, and the follow up thorough root-cause analysis may take longer. NextEra agreed and edited condition to reflect that any “initial report” would be provided to DFPD within 10 business days, “with a follow-up report provided following completion of a root cause analysis.”

WS-7 k and l: No changes from the previous call.

Ricardo Morely: Provided introduction to DFPD team. Ricardo will be developing operational training curriculum for first responders, including DFPD. Ricardo will provide contact information to Chief Shafer to coordinate with DFPD (and other potential responding agencies) on training.

Andrew Reiwitch and Chief Shafer confirmed they don’t have additional questions or input. NextEra will update the language based on this call and provide for DFPD review, along with the requested drone use documentation. Once the language is agreed upon, NextEra will docket the revised COC language and meeting notes with CEC.

Meeting Notes

Date: 9/18/2025

Attendees:	Dixon Fire Protection District (DFPD) <ul style="list-style-type: none">• Chief Randy Shafer• Chief John Malone• Andrew Reiwitch (Bureau Veritas (BV))• Gregory Ledesma (BV)	NextEra <ul style="list-style-type: none">• Stephen Ahn• Josh Adams• Adrian Elizondo• Michael Benson• Scott Galati/DayZen• Elisabeth Esposito/Brownstein Hyatt Farber Schreck• Doug Urry/Tetra Tech• Joe Harrison/Tetra Tech
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Subject: *Corby Battery Energy Storage System Project Fire Protection*

Scott Galati: The purpose of the meeting is to discuss and obtain DFPD concurrence on proposed conditions of certification (COCs) related to fire/worker safety. Proposed agenda/topics including: fire water tank, hydrogen fluoride (HF), first responder information/panel, site access.

Chief Shafer: Clarified that Chief Malone was the Fire Marshall at beginning of the Corby project discussions and is now back for few months to support. Bureau Veritas is now the contract Fire Marshall. DFPD agreed with the proposed agenda and didn't have any topics to add.

Fire Water Tank/Flow rate:

Josh Adams: Described proposed approach consists of 24,000-gal tank with compatible fittings to refill DFPD trucks. Clarified that proposal does not include pressurized tanks equipped with pumps providing active flow.

Chief Malone: Asked whether NextEra followed DFPD tank standards? These standards require a minimum tank size. Connection needs to be on street side. DFPD requires 4.5" connection.

Josh Adams: Confirmed that NextEra referenced the NFPA 1142 and 22 codes as the design basis (consistent with California Fire Code (CFC)).

Chief Malone: Confirmed the design basis is correct.

Hydrogen Fluoride (HF):

Scott Galati: Began conversation requesting clarification whether DFPD's request is to be equipped with personal protective equipment (PPE) for potential HF exposure.

Chief Malone: Stated that DFPD's request is not for additional PPE specifically for HF exposure. Rather, DFPD recommends that HF measurement strips (which can be affixed to existing PPE) be made available in the Knox box or at another easily accessible location for any emergency responders to have access to.

Josh Adams: Confirmed that test strips are the best available technical approach for measuring airborne HF and agreed that the relevant COC could be amended to reflect a requirement to provide HF test strips.

Chief Shafer: Currently Vacaville FD has the closest station to site. DFPD will have a new station that will be closest in future.

Chief Malone: Knox box access should be provided to both agencies (they use different keys).

Josh Adams: Confirmed that Knox box access can be provided to both DFPD and City of Vacaville FD.

Meeting Notes

Josh Adams: Highlighted the applicant's proposal to provide annual training to first responders.
Chiefs Shafer/Malone: Agreed with training proposal.

Light board/first responder information:

Scott Galati: Introduced topic – DFPD has requested a mechanism to enable first responders to quickly identify the container experiencing an issue, in the event of emergency response.

Josh Adams: The design includes two such mechanisms. First, once first responders are on site, a horn and strobe is located on each battery container to alert first responders to the location of the problem. Second, prior to arriving on site, first responders will have access to call NextEra's Renewable Operations Control Center (ROCC), which will provide first responders with real-time information on the incident. As further background, the system includes BESS containers, each with localized fire panel. Communicates with BMS, then EMS (in substation control house). The control House includes fire telemetry panel and BMS/EMS information, available through HMI. The HMI has access to all the BMS/EMS data well above that available in a central fire panel, including fire panel status/alarms, cell/module voltages, current, and temperatures. Offsite ROCC has all the data (and is manned by at least 10 people 24/7).

Chief Shafer: agreed this system meets DFPD requirements.

Access requirements/CFC Section 503:

Adrian Elizondo: NextEra reviewed Section 503 and the local (DFPD) amendment (adopting Appendix D). Project will have an all-weather surface w/hard packed road base and Terragrid stabilizing material capable of supporting 75,000 pounds. Minimum road width requirement is 20 feet; the project will have 24-ft roads. Designed turning radius meets standards. Project includes 2 site access points to BESS, plus 3rd for substation yard.

Andrew Reiwitch: He is not aware of any additional requirements, based on reviewing City of Dixon Code.

Scott: NextEra will update proposed COC to reference local code, in addition to CFC Section 503.

Chief Malone: Recommends adding "any local amendments to 503 or appendices" to capture all local requirements regardless of jurisdiction.

Scott Galati: Asked if there are any other issues or questions that DFPD would like to discuss.

Confirmed that next steps would be to provide DFPD with revised draft COCs consistent with today's discussion for DFPD's final concurrence.

Chief Shafer, Chief Malone, Andrew Reiwitch: each confirmed they had no additional discussion items.
